

# NORTHLAND TRANSPORTATION ALLIANCE



## Request of the Hearing Panel Commissioners

The following Section 32AA like analysis has been prepared to justify the requested amendments to the proposed provisions of the TDA chapter of PPC81, as requested by the Commissioners in their second direction of the Hearing Panel, dated 3 February 2023.

## The Northland Transportation Alliance (NTA) submission

### 1. State Highway 14/ Awakino Point North Road intersection

- The NTA request a Primary Safe System Treatment at the intersection of SH14/Awakino Point North Road. A rural roundabout is a recognised Primary Safe System Treatment in this context.
- The NTA recommend amendment of the proposed rule in the precinct plan to address the road safety and traffic effects at the intersections of SH14/Awakino Point North Road intersection.

### 2. Proposed Shared Path

- The NTA recommend extending the proposed shared user path up to Selwyn Park, but to Finlayson Park Avenue as a minimum.

### 3. Awakino Point North Road/Primary Access intersection and Awakino Point North Road/Industrial Access intersection

- The NTA request Primary Safe System Treatment at the intersections of Awakino Point North Road/Primary access intersection and Awakino Point North Road/Industrial Access intersection.
- The NTA recommend introducing a rule in the precinct plan to address the safety and traffic effects at the intersections of Awakino Point North Road/Primary access intersection and Awakino Point North Road/Industrial Access intersection.

The NTA recommend Safe System Audits to be undertaken for both the detailed design and post construction stages of all major works on the road network.

## Section 32AA Evaluation

Section 32AA of the Resource Management Act 1991 requires a further evaluation to be undertaken in accordance with s32(1)-(4) if any amendment has been made to the proposal (in this case the TDA) since the original s32 evaluation report was completed.

## Evaluation of objectives

Section 32(1)(a) (and therefore s32AA(1)(b)) requires an assessment of whether the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA.

The original s32 analysis report prepared by the applicant considered the objectives of the plan and whether they were the most appropriate way to achieve the sustainable management in the Kaipara District.

The analysis below considers the NTA's submission on the proposed objective in the TDA to satisfy s32AA.

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**Objective 11.5.1** - *To maintain a safe and efficient Transport Network that enables the District to communicate, connect and do business with minimal conflicts between the environment, adjoining land uses, traffic and people.*

- The NTA agree with the submissions put forth by Waka Kotahi, especially the intersection treatment type (roundabout) and that the Trifecta Development chapter to refer to Kaipara District Plan chapter on Signage to maintain consistency throughout the road network.
- The NTA agree with Ministry of Education to provide an educational facility within the development, if the students are to travel to the schools in Dargaville, this increases the vehicle kilometres travelled.
- The NTA agree with Awakino Rate Payers Association on the provision of reserves within the development to reduce the trips generated to Selwyn Park (closest parks/reserve).

## **Evaluation of proposed policies, rules and methods**

Section 32(1)(b) (and thus s32AA(1)(b)) of the RMA requires an examination of the proposed provisions to ensure that they are the most appropriate way of achieving the relevant objectives.

The following options are considered to be reasonably practicable to achieve the objectives:

- Option 1: TDA as originally proposed by the applicant.
- Option 2: Apply proposed amendments to the proposed TDA rules and matters of discretion (TDA-SUB-S10 Transport (3), TDA-SUB-S10 Transport (4), TDA-LU-S4 Transport (1), TDA-LU-S4 Transport (2). This has been proposed by Waka Kotahi, that NTA support.

The TDA provisions in Option 1 provide for *“a safe and efficient Transport Network that enables the District to communicate, connect and do business with minimal conflicts between the environment, adjoining land uses, traffic and people”*. However, NTA’s view is that Option 1 does not specifically address and provide for a safe and efficient transport network in the TDA Chapter 11 Policy 11.63 *“providing for the effective integration of land use and transport planning decisions to achieve a sustainable land transport system”* as noted in NTA’s submission by Mr Marshall *“Compliance is one of the key issues that we face and if an environment does not support the proposed speed limit the operating speed increases rapidly, therefore we require a physical intervention to reduce the speeds, to manage the potential crash forces to a survivable level”*.

To maintain consistency with the Draft Kaipara District Plan and avoid potential discrepancies in the future in the application of the proposed provisions of the TDA, proposed amendments to the proposed TDA rules and matters of discretion in Option 2 is the most reasonably practicable option to achieve the objective.

Option 2 to apply proposed amendments to the proposed TDA rules and matters of discretion (TDA-SUB-S10 Transport (3), TDA-SUB-S10 Transport (4), TDA-LU-S4 Transport (1), TDA-LU-S4 Transport (2) is considered the most appropriate. An evaluation under Section 32AA of the effects and evaluation of the proposed amendments is noted below.

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## Section 32AA Evaluation

The following assessment examines the efficiency and effectiveness of Option 2 and summarises the reasons for deciding on the provisions.

Northland Transportation Alliance (NTA) Requested Changes to Proposed Amendments	Effects and Evaluation of the changes
<p>That TDA-SUB-S10 Transport (3) is amended, as follows:</p> <p>3. Where subdivision is of any allotment within the Light Industrial Area:</p> <p>a. The intersection of State Highway 14 and Awakino Point North Road is upgraded to a <del>T-intersection</del> <u>a roundabout</u>.</p> <p>Awakino Point North Road is sealed from State Highway 14 to the entrance to the Light Industrial Area.</p> <p>That TDA-SUB-S10 (3) includes following:</p> <p>d. Safe system audits should be carried out for all works proposed on the Road network both at Detailed design stage and post construction stage.</p> <p>e. The intersection of Awakino Point North Road/Industrial Access intersection is to be compliant with a Primary Safe system treatment.</p>	<p>This Plan Change seeks to upgrade the intersection of SH14/Awakino Point North Road. As per the evidence of Mr Marshall, to mitigate the transport effects of the Plan Change, a roundabout is required rather than a T-intersection.</p> <p>A roundabout is the most appropriate solution, combined with a speed limit reduction to achieve the outcomes sought in the Operative Kaipara District Plan.</p> <p>To achieve the objectives and policies of the District, with specific reference to the transport network, the Plan Change would need to provide an intersection upgrade that is safe and efficient. As detailed in Mr Marshall’s evidence, a T-intersection would not achieve the outcomes sought in the Operative Kaipara District Plan.</p> <p>Of particular relevance is:</p> <p><b><u>Chapter 3 - Land Use and Development Strategy</u></b></p> <ul style="list-style-type: none"> <li>• <b>Objective 3.4.5</b> [To provide appropriate infrastructure and servicing in advance of or alongside future residential and business development]; and</li> <li>• <b>Policy 3.5.5</b> [By ensuring infrastructure and servicing (e.g. transport, stormwater and sewerage reticulation and treatment systems and networks) for new development areas are designed and provided for at the outset of development, so that any adverse effects on the environment or existing systems are adequately avoided, remedied or mitigated].</li> </ul>

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	<p><b>Chapter 11 – Transport Network</b></p> <ul style="list-style-type: none"> <li>• <b>Objective 11.5.1</b> [To maintain a safe and efficient Transport Network that enables the District to communicate, connect and do business with minimal conflicts between the environment, adjoining land uses, traffic and people].</li> <li>• <b>Policy 11.6.3</b> [By providing for the effective integration of land use and transport planning decisions to achieve a sustainable land transport system].</li> </ul>
<p>That TDA-SUB-S10 Transport (4) is amended, as follows:</p> <p>4. Where subdivision is of any allotment within the General Residential Area:</p> <p>a. The intersection of State Highway 14 and Awakino Point North Road is upgraded to a <del>T intersection</del> <u>a roundabout</u>.</p> <p>b. A pedestrian and cycle link from the intersection of State Highway 14 and Awakino Point North Road to <del>Tuna Street</del> Selwyn Park or existing footpath network on Finlayson Park Avenue is <del>provided</del> <u>completed</u>.</p> <p>...</p> <p>f. Awakino Point North Road is sealed from State Highway 14 to the furthest entrance to the General Residential Area, Neighbourhood Centre Area and Large Lot Residential Area.</p> <p>That TDA-SUB-S10 (4) includes following:</p> <p>g. The intersection of Awakino Point North Road/Primary access intersection and Awakino Point North Road/Industrial Access intersection is to be compliant with a Primary Safe system treatment.</p> <p>h. Safe system audits should be carried out for all works proposed on the Road network both at Detailed design stage and post construction stage.</p> <p>Matters of discretion:</p> <p>1. TDA-SUB-S13 Matters of Control and</p>	<p>This Plan Change seeks to upgrade the intersection of SH14/Awakino Point North Road. As per the evidence of Mr Marshall, to mitigate the transport and road safety effects of the Plan Change, a roundabout is required rather than a T-intersection.</p> <p>A roundabout is the most appropriate solution, combined with a speed limit reduction to achieve the outcomes sought in the Operative Kaipara District Plan.</p> <p>The type of intersection treatment of the local roads is to be addressed at the resource consent stage, but it should be compliant with Safe system principles to reduce the likelihood and severity of crashes.</p> <p>Of particular relevance is:</p> <p>Chapter 3 - Land Use and Development Strategy</p> <ul style="list-style-type: none"> <li>• Objective 3.4.5 [To provide appropriate infrastructure and servicing in advance of or alongside future residential and business development]; and</li> <li>• Policy 3.5.5 [By ensuring infrastructure and servicing (e.g. transport, stormwater and sewerage reticulation and treatment systems and networks) for new development areas are designed and provided for at the outset of development, so that any adverse effects on the environment or existing systems are adequately avoided, remedied or mitigated].</li> </ul>

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<p>Discretion.</p> <ol style="list-style-type: none"> <li>2. Safe, Efficient and effective transport network.</li> <li>3. Traffic safety in relation to site ingress and egress.</li> <li>4. Pedestrian and cyclist safety and navigability.</li> <li>5. Consistency with an approved Access Plan under rule TDA-LU-R3 Any Activity and TDA-LU- S4 Transport.</li> <li>6. Urban design and streetscape character and amenity in the General Residential Area, Neighbourhood Centre Area and Hauora Open Space Area.</li> <li>7. <del>Whether an intersection upgrade is warranted by the scale of the subdivision and volume of traffic generated.</del></li> <li>87. Consideration of street trees and entrance treatments for the Awakino Point North Road entrances.</li> <li>98. Results of any consultation with tāngata whenua with respect to street naming.</li> </ol>	<p>Chapter 11 – Transport Network</p> <ul style="list-style-type: none"> <li>• Objective 11.5.1 [To maintain a safe and efficient Transport Network that enables the District to communicate, connect and do business with minimal conflicts between the environment, adjoining land uses, traffic and people].</li> <li>• Policy 11.6.3 [By providing for the effective integration of land use and transport planning decisions to achieve a sustainable land transport system].</li> </ul>
<p>Amend TDA-LU-S4 Transport (1), as follows:</p> <ol style="list-style-type: none"> <li>1. Prior to establishment of any activity other than Farming in the Light Industrial Area:             <ol style="list-style-type: none"> <li>a. Upgrade of the intersection of State Highway 14 and Awakino Point North Road to a <del>7 intersection</del> <u>roundabout</u> must be complete.</li> <li>d. Awakino Point North Road must be sealed from State Highway 14 to the entrance to the Light Industrial Area.</li> </ol> </li> </ol> <p>TDA-LU-S4 Transport (1) to include following:</p> <ol style="list-style-type: none"> <li>e. A primary safe system compliant treatment to be implemented at Awakino Point North Road/Industrial Access intersection.</li> </ol>	<p>This Plan Change seeks to upgrade the intersection of SH14/Awakino Point North Road. As per the evidence of Mr Marshall, to mitigate the transport effects of the Plan Change, a roundabout is required rather than a T-intersection.</p> <p>A roundabout is the most appropriate solution, combined with a speed limit reduction to achieve the outcomes sought in the Operative Kaipara District Plan.</p> <p>The type of intersection treatment of the local roads is to be addressed at the resource consent stage, but it should be compliant with Safe system principles to reduce the likelihood and severity of crashes.</p> <p>Of particular relevance is:</p> <p>Chapter 3 - Land Use and Development Strategy</p> <ul style="list-style-type: none"> <li>• Objective 3.4.5 [To provide appropriate infrastructure and servicing in advance of or alongside future residential and business development]; and</li> <li>• Policy 3.5.5 [By ensuring infrastructure and servicing (e.g. transport, stormwater</li> </ul>

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	<p>and sewerage reticulation and treatment systems and networks) for new development areas are designed and provided for at the outset of development, so that any adverse effects on the environment or existing systems are adequately avoided, remedied or mitigated].</p> <p>Chapter 11 – Transport Network</p> <ul style="list-style-type: none"> <li>Objective 11.5.1 [To maintain a safe and efficient Transport Network that enables the District to communicate, connect and do business with minimal conflicts between the environment, adjoining land uses, traffic and people].</li> <li>Policy 11.6.3 [By providing for the effective integration of land use and transport planning decisions to achieve a sustainable land transport system].</li> </ul>
<p>Amend TDA-LU-S4 Transport (2), as follows:</p> <p>2. Prior to occupation of any residential unit in the General Residential Area:</p> <p>a. Upgrade of the intersection of State Highway 14 and Awakino Point North Road to a <del>£ intersection</del>—<u>roundabout</u> must be completed.</p> <p>...</p> <p>e. Awakino Point North Road must be sealed from State Highway 14 to the furthest entrance to the General Residential Area, Neighbourhood Centre Area and Large Lot Residential Area.</p> <p>TDA-LU-S4 Transport (2) to include following:</p> <p>f. A primary safe system compliant treatment to be implemented at Awakino Point North Road/ Primary access intersection</p>	<p>This Plan Change seeks to upgrade the intersection of SH14/Awakino Point North Road. As per the evidence of Mr Marshall, to mitigate the transport effects of the Plan Change, a roundabout is required rather than a T-intersection.</p> <p>A roundabout is the most appropriate solution, combined with a speed limit reduction to achieve the outcomes sought in the Operative Kaipara District Plan.</p> <p>The type of intersection treatment of the local roads is to be addressed at the resource consent stage, but it should be compliant with Safe system principles to reduce the likelihood and severity of crashes.</p> <p>Of particular relevance is:</p> <p>Chapter 3 - Land Use and Development Strategy</p> <ul style="list-style-type: none"> <li>Objective 3.4.5 [To provide appropriate infrastructure and servicing in advance of or alongside future residential and business development]; and</li> <li>Policy 3.5.5 [By ensuring infrastructure</li> </ul>



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	<p>and servicing (e.g. transport, stormwater and sewerage reticulation and treatment systems and networks) for new development areas are designed and provided for at the outset of development, so that any adverse effects on the environment or existing systems are adequately avoided, remedied or mitigated].</p> <p>Chapter 11 – Transport Network</p> <ul style="list-style-type: none"><li>• Objective 11.5.1 [To maintain a safe and efficient Transport Network that enables the District to communicate, connect and do business with minimal conflicts between the environment, adjoining land uses, traffic and people].</li><li>• Policy 11.6.3 [By providing for the effective integration of land use and transport planning decisions to achieve a sustainable land transport system].</li></ul>
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**Table 1. Trifecta Development Area – Recommended Amendments Analysis**

Provisions most appropriate to achieve the objective	Effectiveness and efficiency	
	Benefits	Costs
<p><b>Amendments to</b></p> <ul style="list-style-type: none"> <li>• TDA-SUB-S10 Transport (3)</li> <li>• TDA-SUB-S10 Transport (4)</li> <li>• TDA-LU-S4 Transport (1)</li> <li>• TDA-LU-S4 Transport (2)</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• No material change from the original proposed TDA provisions.</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• No material change from the original proposed TDA provisions.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Supports the social-wellbeing of communities by better enabling safe and efficient access.</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• No material change from the original proposed TDA provisions.</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• No material change from the original proposed TDA provisions.</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Likely to result in a small percentage increase in total cost compared to the original proposed TDA provisions.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• No material change from the original proposed TDA provisions.</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• No identified cultural costs.</li> </ul>
<p><b>Opportunities for economic growth and employment</b></p> <p>Provision of safe and appropriate intersection treatments will enable improved access to employment.</p> <p>Provision of a safe well-connected cycle and footpath connection between XYZ and Dargaville will provide equitable access opportunities for vulnerable transport disadvantaged road users. Including those using mobility scooters and pushbikes.</p>		
<p><b>Risks of acting or not acting</b></p> <p>The risk of not providing a Primary Safe System intersection for State Highway 14/Awakino Point North Road intersection, is a significant increase in the likelihood of Death or Serious injury from road trauma.</p> <p>Not providing a safe well-connected cycle and footpath connection between XYZ and Dargaville will increase the traffic along SH14 and may result in Transport Disadvantaged people being unable to access critical services or forced to cycle/walk/ride mobility scooters along state highway 14.</p>		



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## Summary

Adopting the proposed amendments to (TDA-SUB-S10 Transport (3), TDA-SUB-S10 Transport (4), TDA-LU-S4 Transport (1), TDA-LU-S4 Transport (2) is considered the most efficient and effective method of implementing the outcomes sought by the objective (Option 2).

Upgrading the intersection of State Highway 14/Awakino Point North Rd to a roundabout and not a T intersection within the Plan Change Area will better provide for the effective integration of land use and transport planning decisions to achieve a sustainable land transport system.

## Relief sought by the NTA

After considering the s42A Report and the recommendations contained within it, as well as the evidence presented by the applicant and their experts, the NTA considers there are a number of key issues as summarised below:

1. That the intersection of State Highway 14/Awakino Point North Rd should be upgrade to a rural roundabout and not a T intersection as proposed by the Applicant.

Mr Collins of Waka Kotahi has concluded that a roundabout is the appropriate intersection upgrade as a *“roundabout is not dependent on a reduction of the speed limit, as the geometry of the roundabout encourages a lower approach speed, provided drivers have sufficient time to observe the roundabout and adjust their speed when approaching SH14 from the north and south of Awakino Point North Road. In essence, the roundabout is “self-explaining” to drivers.”* Mr Marshall of NTA, also concludes that a roundabout is the most appropriate solution, combined with a speed limit reduction to achieve the outcomes sought in the Operative Kaipara District Plan.

2. The following planning provisions should be amended to reference the intersection of State Highway 14/Awakino Point North Rd be upgraded to a roundabout, as detailed in the above s32AA evaluation table:
  - TDA-SUB-S10 Transport (3)
  - TDA-SUB-S10 Transport (4)
  - TDA-LU-S4 Transport (1)
  - TDA-LU-S4 Transport (2)
3. The NTA recommend extending the proposed shared user path up to Selwyn Park from the proposed Residential Zone.
  - TDA-SUB-S10 Transport (4)
4. The NTA request Primary Safe System Treatment at the intersections of Awakino Point North Road/Primary access intersection and Awakino Point North Road/Industrial Access intersection.
  - TDA-SUB-S10 Transport (3)
  - TDA-SUB-S10 Transport (4)
  - TDA-LU-S4 Transport (1)
  - TDA-LU-S4 Transport (2)
5. The NTA recommend introducing a rule in the precinct plan to address the safety and traffic effects at the intersections of Awakino Point North Road/Primary access intersection and

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Awakino Point North Road/Industrial Access intersection.

- TDA-SUB-S10 Transport (3)
  - TDA-SUB-S10 Transport (4)
  - TDA-LU-S4 Transport (1)
  - TDA-LU-S4 Transport (2)
6. The NTA recommend Safe System Audits to be undertaken for both the detailed design and post construction stages of all major works on the road network.
- TDA-SUB-S10 Transport (3)
  - TDA-SUB-S10 Transport (4)

## Conditions

The following planning provisions noted in the NTA submission and further submission should be adopted into the final planning provisions set:

1. Intersection of State Highway 14/Awakino Point North Road to be upgraded to be Safe System Compliant Primary Treatment – a roundabout.
2. Primary Safe System Treatment at the intersections of Awakino Point North Road/Primary access intersection and Awakino Point North Road/Industrial Access intersection
3. Design and post construction Safe System Audits carried out in accordance with NZTA's Safe System Audit Guidelines (2022), where all Serious and significant Risks identified are mitigated to at least a residual risk of Moderate.
4. The upgrades are to be appropriately conditioned for staging and they are to comply with the revised Kaipara District Council Engineering Standards.
5. Proposed shared user path is to terminate at Selwyn Park or Finlayson Park Avenue as a minimum.
6. Pedestrian crossings to connect with Selwyn Park and the proposed residential zone should be a Safe System Compliant Primary Treatment.

Thank you for considering the NTA's s32AA evaluation.

Yours sincerely  
Nick Marshall

**Nick Marshall**

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